

MARK A. HUTCHISON (4639)
ROBERT T. STEWART (13770)
HUTCHISON & STEFFEN, LLC
10080 W. Alta Drive, Suite 200
Las Vegas, NV 89145
(702) 385-2500
Fax: (702) 385-2086
mhutchison@hutchlegal.com
rstewart@hutchlegal.com

ANDREW M. GROSSMAN (*pro hac vice*)
MARK W. DELAQUIL (*pro hac vice*)
BAKER & HOSTETLER LLP
1050 Connecticut Avenue, N.W., Suite 1100
Washington, D.C. 20036
(202) 861-1697
Fax: (202) 861-1783
agrossman@bakerlaw.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

**GILBERT P. HYATT and
AMERICAN ASSOCIATION FOR
EQUITABLE TREATMENT, INC.,**

Plaintiffs,

v.

**OFFICE OF MANAGEMENT AND
BUDGET and SHAUN DONOVAN,
in his official capacity as Director of
the Office of Management and Budget,**

Defendants.

Civil Case No: 2:16-cv-01944-JAD-GWF

**STIPULATION TO EXTEND TIME
TO FILE RESPONSE TO MOTION TO
DISMISS AND TO FILE REPLY BRIEF
(First Request)**

ORDER

1 Pursuant to Fed. R. Civ. P. 6 and Local Rule IA 6-1, Plaintiffs and Defendants
2 respectfully submit for the Court's consideration this Stipulation to extend Plaintiffs'
3 deadline to respond to Defendants' Motion To Dismiss, Doc. No. 19, to December 16, 2016,
4 and to extend Defendants' deadline to file a reply in support of that motion to January 6,
5 2017. In support of this Stipulation, Plaintiffs and Defendants state as follows:

6 1. This litigation challenges Defendants' administration of the Paperwork
7 Reduction Act, 5 U.S.C. § 44 U.S.C. § 3501 et seq. Plaintiffs filed their Complaint, Doc. No.
8 1, on August 16, 2016, and Defendants filed their Motion To Dismiss on November 16,
9 2016. Under the Court's rules, Plaintiffs' response to that motion is currently due on or
10 before December 5, and Defendants' reply is due seven (7) days after service of Plaintiffs'
11 response.

12 2. The parties agree that extensions of those deadlines are warranted in light of
13 the coming holidays, planned absences of attorneys, the nature of the issues raised in
14 Defendants' motion, and previously scheduled briefing deadlines in other cases.

15 3. Each of these extensions is requested for the first time. Because this litigation
16 is at an early stage and principally concerns issues of law, the requested extensions,
17 amounting to less than 26 days in total, will not significantly delay the disposition of this
18 case.

Conclusion

For the foregoing reasons, Plaintiffs and Defendants respectfully submit that good cause exists for the requested extensions and respectfully request that the Court grant this Stipulation for an extension of time through and including December 16, 2016, for Plaintiffs to file a response to Defendants' Motion To Dismiss and an extension of time through and including January 6, 2017, for Defendants to file a reply in support of their motion.

Dated: November 18, 2016

Respectfully submitted,

/s/ Andrew M. Grossman
ANDREW M. GROSSMAN (*pro hac vice*)
MARK W. DELAQUIL (*pro hac vice*)
BAKER & HOSTETLER LLP
1050 Connecticut Avenue, N.W., Suite 1100
Washington, D.C. 20036
(202) 861-1697
Fax: (202) 861-1783
agrossman@bakerlaw.com

Attorneys for Plaintiffs

BENJAMIN C. MIZER
Principal Deputy Assistant Attorney General


DANIEL G. BOGDEN
United States Attorney
District of Nevada
BLAINE T. WELSH
Assistant United States Attorney

ERIC R. WOMACK
Assistant Branch Director

/s/ M. Andrew Zee (by permission)
M. ANDREW ZEE
Attorney (CA Bar No. 272510)
United States Department of Justice
Civil Division, Federal Programs Branch
450 Golden Gate Avenue, Room 7-5395
San Francisco, CA 94102
Phone: (415) 436-6646
Email: m.andrew.zee@usdoj.gov

Attorney for Defendants

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE
Dated: November 21, 2106.